

RX News Bulletin

Bureau of
Narcotics & Dangerous Drugs

Fall 2019

Missouri Department of Health and Senior Services

health.mo.gov/safety/bndd/index.php

DEA Amends Regulation for Form 222 Official Order Forms

The United States Drug Enforcement Administration has published new regulations for how DEA Form 222 Official Order Forms are handled. Previously registrants could either purchase Schedule II controlled substances electronically through the controlled substance ordering system, or they could execute the triplicate carbon forms for a paper process.

The DEA has amended this rule to eliminate the need and requirement for the triplicate carbon paper forms. Registrants will have only one sheet of paper for a written order form. After filling out the form to request drugs, the purchaser will need to make their own photocopy and then send the original to their supplier. When the drug shipment is received, the purchase can document their date of receipt on the copy they made. There will be no more carbons.

Registrants may continue to use up their current order forms. If the forms are not going to be used, registrants are asked to return their carbon triplicate forms to their local DEA district office. To read the rule language from the DEA, please visit their website at www.deadiversion.usdoj.gov and on their homepage click the link to "What's New" and view the document released on September 30, 2019.

BNDD Follow Up...

Fall 2019:

Drug Take-Back Statistics

The DEA completed its semi-annual drug take-back day on Saturday, October 27, 2019. The DEA collected and destroyed 38,462 pounds of unwanted medications. It is anticipated that these amounts may start to decline. Missouri now has free disposal drop boxes at 113 law enforcement locations and 157 pharmacy or hospital locations. For a list of locations, please visit the BNDD website at <https://health.mo.gov/safety/bndd> and click on the link to "How Citizens Can Dispose of Unwanted Medications."



BNDD Attends the National Association of State Controlled Substance Authorities Convention

The Missouri BNDD is a member of the National Association of State Controlled Substance Authorities (NASCSA). Administrator Michael Boeger attended their annual training conference in October where there were representatives of the other state regulatory agencies and also manufacturers, distributors, and pharmacy chains from the private sector.



Distributors to Report “Suspicious Orders”

The DEA requires that distributors report suspicious orders. The DEA is implementing their electronic reporting system for this called the Suspicious Order Reporting System (SORS). The Missouri BNDD has a similar regulation that matches the federal DEA regulatory language. BNDD routinely receives suspicious order requests by email from distributors.

State Regulation 19 CSR 30-1.032 (1), (2), state:

- (1) Before distributing a controlled substance to any person who the registrant does not know to be registered to possess the controlled substance, the registrant shall make a good faith inquiry either with the federal Drug Enforcement Administration (DEA) or with the Department of Health and Senior Services to determine that the person is registered to possess the controlled substance.
- (2) The registrant shall design and operate a system to disclose to the registrant suspicious orders of controlled substances. The registrant shall inform the Department of Health and Senior Services of suspicious orders when discovered by the registrant. Suspicious orders include orders of unusual size, orders deviating substantially from a normal pattern and orders of unusual frequency.

Many of the reports received are circumstances where a purchaser has requested an unusual amount that violates a threshold set by the distributor, or the purchase request is submitted too soon before a certain number of days has passed. One of the most important reports that BNDD receives is when a distributor has chosen to stop their relationship with a purchaser and they have ceased shipping drugs to a customer for a particular reason.

DEA Hosts Free Practitioner Diversion Awareness Conferences

As part of their ongoing efforts to provide education to registrants the DEA Liaison Section arranged for Practitioner Diversion Awareness Conferences around the country. The DEA has done this in previous years with all the distributors and then pharmacies. At this time they are visiting states to meet with prescribers. The DEA held two free educational conferences in Columbia, Missouri, on November 4-5, 2019.

The BNDD and DEA had announced the conferences on their websites and also notified state professional associations. The conference covered the opioid abuse epidemic, overdose and death statistics, disposing of unwanted medications, telemedicine, methods of diversion, and required record keeping and security for controlled substances. BNDD also presented during both conferences which were also attended by BNDD investigators so they could meet and network with practitioners.



Staying busy at BNDD:

The BNDD is in the process of developing an online system so that loss reports can be submitted electronically instead of filling out paper and mailing or faxing them. More information will be released as the system is developed. Registrants will be able to visit a link to send the information electronically. Also, the BNDD is preparing to amend regulations to update the list of controlled substances, while updating the registration rule for EMS so that only one registration is required at one main location.

The DEA announced that they are currently reviewing and updating their controlled substance guideline documents available on their website. Rule amendments for electronic prescriptions, telemedicine registrations, and mobile vans are presently under review.

The DEA stated that they have received concerns of the drug *gabapentin*. This drug is not a controlled substance with the DEA or Missouri BNDD at this time. The DEA is currently reviewing this drug.

Check It Out

You can find educational documents on the BNDD website at <http://health.mo.gov/safety/bnnd/publications.php>. Documents such as the "CDC Opiate Prescribing Guidelines" and also "Preventing Prescription Fraud" can be viewed.

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